

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 98  
PENSION FUND on behalf of itself and all  
others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE, LLP;  
DELOITTE LLP,

Defendants.

Case No. 3:19-cv-3304

**CLASS ACTION**

**DEFENDANTS' NOTICE OF COMPLIANCE AND  
CERTIFICATION OF DISCLOSURE**

Defendants Deloitte & Touche LLP (“D&T”) and Deloitte LLP (collectively, “Deloitte” or “Defendants”), by and through undersigned counsel, and in accordance with the Fifth Amended Consent Scheduling Order, ECF No. 229, gives notice that it has identified the persons whom it expects to call as experts at trial to offer affirmative testimony, and certifies that this notice has been served upon counsel for the Lead Plaintiff on September 13, 2024. Defendants reserve the right to disclose any additional experts as permitted by the Federal Rules of Civil Procedure, including for purposes of rebuttal and in response to Lead Plaintiff’s affirmative expert reports to be served on September 27, 2024.

The following individual has been retained or specially employed by Defendants to provide affirmative expert testimony on the topics below:

1. **Paul J. Hibbard**

*Analysis Group*  
c/o Jed. M. Schwartz  
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Topics: Regulatory framework (including the roles of the various parties involved);  
prudence reviews

Defendants reserve the right to call any expert witness identified or called by Lead Plaintiff.

Dated: September 13, 2024

Respectfully submitted,

/s/Daniel R. Fuerst

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